

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Chad A. Lucabaugh	:	
Debtor	:	Chapter 13
	:	
Charles J. DeHart, III, Trustee,	:	
Movant	:	Case No. 1:15-bk-04588
v.	:	
	:	
Chad A. Lucabaugh	:	
Respondent	:	

DEBTOR'S ANSWER TO
TRUSTEE'S MOTION TO DISMISS

COMES NOW, this 23rd day of October, 2017, Chad A . Lucabaugh, by and through counsel, CGA Law Firm, Craig S. Sharnetzka, Esquire, and Answers the Motion to Dismiss as follows:

On or about October 5, 2017, the Chapter 13 Trustee filed a Motion to Dismiss for failure to make timely payments pursuant to the Chapter 13 Plan.

On October 12, 2017, the Debtor is sent a payment to the Trustee in the amount of \$1,200.00 . On October 21, 2017 the Debtor sent a second payment to the Trustee in the amount of \$1,144.71. The amount of the Debtor's delinquency on the Trustee's Motion to Dismiss is \$2,344.71 and therefore the two payments will cure the arrears on his Chapter 13 Plan payments prior to the Motion to Dismiss hearing scheduled for Wednesday, November 1, 2017.

WHEREFORE, Debtor prays that this Honorable Court deny Trustee's Motion to Dismiss in that the required payments were made by the Debtor prior to the Motion to Dismiss hearing.

/s/Craig S. Sharnetzka
Craig S. Sharnetzka, Esquire
Sup. Ct. I.D. No. 83863
135 North George Street
York, PA 17401
(717) 848-4900
Counsel for the Debtor

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 23, 2017, he served a true and correct copy of the Answer to Motion to Dismiss filed in the above-captioned matter on the following:

Charles J. DeHart, III, Trustee, ECF

/s/Craig S. Sharnetzka
Craig S. Sharnetzka, Esquire